

Local Rule 37.2 Certification

On February 9, 2018, I emailed Plaintiff's counsel David Owens and requested that he consent to a stay of written discovery as to Defendants Montgomery County, Denise Rankin, and Kenneth Betz (the "County Defendants"), pending the Court's resolution of the County Defendants' motion to dismiss. Also on February 9, 2018, I emailed counsel for all defendants other than the County Defendants. In said email, I made the same request that I had made to David Owens.

On February 13, 2018, Carl Cormany of Mazanec, Raskin & Ryder, agreed via email to the requested stay, on behalf of his client Defendant Matthew Scott Moore. On February 14, 2018, the following counsel agreed via email to the requested stay, on behalf of their respective clients: Andrew Robertson of Graydon Head & Ritchey, on behalf of Defendants Keith Stapleton and David Burke; and Jonathan Deters of Schroeder, Maundrell, Barbieri & Powers, on behalf of Defendants Thomas Angel, John DiPietro, and Stephen Gray. On February 14, 2018, I spoke with the following counsel, who agreed to the requested stay on behalf of their respective clients: Joel Sechler of Carpenter & Lipps, on behalf of Defendant General Motors; and Rory Garrity of Freund Freeze & Arnold, on behalf of Defendant Robert Miller.

Also on February 14, 2018, I spoke with Matthew Schultz, an attorney at Brannon & Associates. Dwight Brannon of Brannon & Associates represents Defendant Richard Wolfe. Mr. Schultz advised on February 14, 2018 that he had no objection to the requested stay. On February 23, 2018, Mr. Schultz confirmed via an email, to which Dwight Brannon was copied, that Defendant Wolfe consented to the requested stay.

On February 14, 2018, Plaintiff's counsel David Owens advised via email that he objected to the requested stay.

On February 15, 2018, Kari Hehmeyer of Reminger, agreed via email to the requested stay, on behalf of her clients Defendants Tim Wilson and Marvin Scothorn. On February 21, 2018, I spoke with Dawn Frick of Surdyk, Dowd & Turner, who advised, on behalf of her client Miami Township, that she did not oppose any motion of the County Defendants for a stay.